

DECLARATION OF ROBERT VAUGHN YOUNG

I, Robert Vaughn Young, hereby declare as follows.

1. I am over 18 years of age and am a resident of Newport Beach, California.

INTRODUCTION

2. From 1969-89, I was a staff member in various Scientology entities, from Church of Scientology organizations to the secular Scientology groups such as Author Services, Inc. ("ASI") During this time I held numerous senior executive positions and was often called on to be a representative or spokesman for Scientology. I have been called to testify on behalf of Scientology in court proceedings and testify before Congressional subcommittees. I worked directly with a number of local, state and federal agencies, representing Scientology. When Scientology founder Lafayette Ronald Hubbard ("Hubbard") died in 1986, I went to his secret ranch with David Miscavige ("Miscavige") within hours of Hubbard's death to handle the media and to help create the story that we would feed to the media and the membership to explain Hubbard's death. After the power struggle to determine who would run the international organization and control the hundreds of millions of dollars after Hubbard's death (Miscavige won the struggle), I was caught in the purge and sent to a secret gulag for "rehabilitation" where I spent 14 months. I fled in 1989, with my wife, after I was physically beaten by Hubbard

Trustee Norman F. Starkey for refusing to comply with an illegal order and was told I would never be able to leave.

3. Because of my senior executive position and my 20 years in the cult, I acquired extensive knowledge about techniques that I and others used to control members as well as attack critics. I was privy to the most secret directives, including those from Hubbard. I also trained with these materials and trained others.

REGARDING VICKI AZNARAN

4. I have two declarations (7 and 14 pages, the first being a shorter version of the second) by Vicki J. Aznaran ("Aznaran") dated May 19, 1994, in which she gives her credentials for trying to depict those in litigation with Scientology or critical of Scientology. I knew Vicki Aznaran both personally and professionally while in Scientology. (I also have spoken on the phone with her since she left the cult.) Since I was an executive in the organization that spawned the Religious Technology Center ("RTC") where she served her final days in 1986-87. I was thus privy to her work and know more about the policies that govern conflicts that she seeks to characterize.

5. Sadly, Aznaran has been less than honest, to say the least. For example, she berates those who sue Scientology, who make accusations and then settle for large sums of money. But this is exactly what she and her husband did when they settled a suit only a few weeks ago. Now, after reportedly receiving a large sum of money from the cult, she suddenly is refuting not only statements in her complaint against Scientology but her earlier declarations, apparently oblivious that she is subject to sworn examination now as to how much Scientology paid her and her husband, the nature of their agreement, what she has actually said, etc. She is also

oblivious that she is about to be caught in Scientology's Fair Game doctrine, the very doctrine she says does not exist: she will be squeezed dry by this cult and then, if she needs legal protection, she will be thrown to the wolves.

5. Aznaran tries desperately in her declaration to paint critics as being controlled by attorneys, down to attorneys writing the declarations, when really that is now her plight. I am a professional writer and editor. I know writing styles, including hers. There are declarations she filed that she wrote. She did not write these two and it would be meaningless except that she makes such non-authorship to be a major point!

THE AZNARAN BIG LIE

6. The primary thrust of the Aznaran declaration is to try to hoodwink the court that the Scientology Fair Game doctrine does not exist, except "as a litigation tactic employed against the church." (original emphasis) This is a classic Big Lie: tell a lie so big that people will believe it.

7. The Fair Game doctrine has been proven to exist time and again, even by the courts. Aznaran even told how she practiced it by, for example, culling confidential pre-clear folders to find personal secrets to use against targets of Fair Game. She also knows the phrase "Fair Game" is never voiced so we could claim as loyal Scientologists that "Fair Game does not exist" when all we truly meant was that the phrase "Fair Game" does not exist. That is why she can "truthfully" say that she "never heard it referred to as a policy" in Scientology. No, she did not hear the words because we were under orders from Hubbard to not use the words. But Fair Game as a doctrine and policy was executed and she was one of the people that did it because she was at the top of the organization (RTC) that

implements the tactic. This is done down through the Office of Special Affairs, which used to be called the Guardian's Office, which was raided in 1977 by the FBI for carrying out Fair Game tactics against the federal government. Hubbard's wife and ten other executive went to jail in 1980 for implementing the Fair Game doctrine.

8. Simply put, Fair Game is the doctrine that Hubbard created to destroy his enemies, especially via abusive litigation. The doctrine is in writing and appears in directive after directive. When it created a flap in Australia in the 1960s, Hubbard gave orders to cancel the use of the phrase "Fair Game" but not the practice of Fair Game. Since then, the attempt has been made to say the practice was cancelled. It was not and a reading of the "cancellation" show that Hubbard said to stop using the words "Fair Game" but don't stop the practice. Aznaran, now back in their control, tries to continue the pretense but even the courts have refuted Scientology's claims that the practice of Fair Game has stopped. (See ¶9.)

9. On October 25, 1993, I filed (in an unrelated case) a 48 page declaration with about two dozen supporting documents showing the history of Fair Game and proof that it continues. I am attaching a true and correct copy of that declaration and documents so the court may see that according to Scientology's own directives (many in bound Scientology books) and the findings of other courts, Fair Game not only exists but is being executed today against Gerry Armstrong via this court: to sue and harass him in order to destroy him. This is per Hubbard's policies and these policies have not been cancelled.

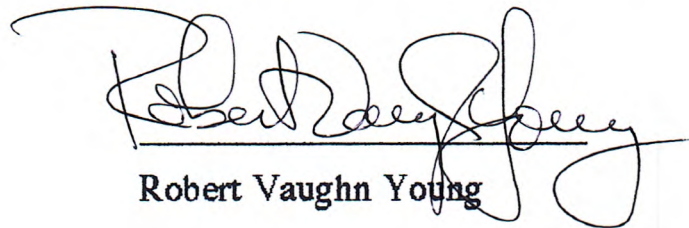
10. By comparison, Aznaran cannot provide any documents to support her contention (e.g., "The Fair Game policy was a policy to forward Scientology's belief that any attacks on Scientology by those

seeking to destroy it were to be vigorously defended by legal means and never ignored") because there are none. To the contrary, Scientology's own documents (not to mention the findings of the courts) prove Fair Game existed and continues to exist as a doctrine.

11. Aznaran may claim that she "never heard [Fair Game] referred to as a policy" while a staff member but the Hubbard policies and directives that I attached to my declaration of October 25, 1993, that tell how to implement Fair Game tactics (to sue, harass, intimidate, destroy, etc.) were all studied by her and were in the pack of material that she had for her position (called a "hat") of Inspector General. (Many of them are also contained in the pack of material used for the "hat" of the President of the Church of Scientology International, a pack that he voluntarily assembled.)

I declare under penalty of perjury and the laws of the State of California that the foregoing is true and correct.

Executed this 1st day of September, 1994, at Newport Beach, California.



Robert Vaughn Young